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Attorneys for Plaintiff
CLARK WALKER

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CLARK WALKER,

Plaintiff,

V₁

CONTRA COSTA COUNTY and
KEITH RICHTER,

Defendants.

C 03 3723 TEH
(CONSOLIDATED CASES)

C 03 3723 TEH

CLARK WALKER,

Plaintiff,

V.

CONTRA COSTA COUNTY; KEITH RICHTER and RICHARD GRACE,

Defendants.

C 05 2800 TEH

STIPULATION AND [PROPOSED]
ORDER RE: DISCLOSURE OF
CONFIDENTIAL MATERIALS AT TRIAL

1 The parties to these consolidated actions, by their counsel, agree and stipulate as
2 follows:

3 1. Confidential material relating to third parties in these actions

4 has been produced to plaintiff by defendants under protective orders issued by this court. The
5 material contains confidential financial employment information and employment application
6 information that defendants are under duty to protect from disclosure. The material
7 produced has been distinctively marked as confidential. This material is called "confidential
8 material" hereafter in this stipulation and order.

9 2. Certain portions of confidential material have been designated

10 by the parties as potential trial exhibits in pretrial exhibit lists and is proposed by the parties to
11 be included in the exhibits to be lodged with the court pre-trial.

12 3. To avoid violation of existing protective orders, and to ensure

13 that relevant materials are available for use by the parties at trial, and to avoid prejudice to any
14 party, the parties have agreed and hereby stipulate that the court order that if confidential
15 material marked as exhibit(s) to be used at trial, it shall be redacted to protect the privacy of
16 third parties to the action by redacting identifying information from the confidential material
17 and to remove distinctive markings intended to protect the material in the discovery process.
18 The information to be redacted includes names, social security numbers, other account and
19 identifying numbers, addresses, and other such information that is not required for an
20 understanding of the documents but might compromise the privacy of the individuals involved.

21 4. The purpose of this stipulation is to ensure that confidential

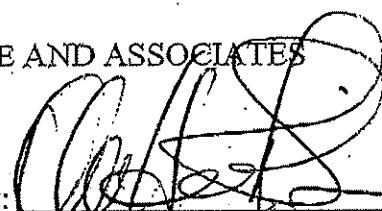
22 material is conveniently available to the parties at trial in a form that does not unnecessarily
23 compromise the privacy of third parties in the event the court determines that the material
24 should be admitted in evidence or otherwise disclosed, wholly or in part, at trial. Nothing in
25 this stipulation waives any objection by any party to the use of any confidential material at trial,
26 including an objection that the privacy interests of the subject of the confidential material
27 outweigh the interest of the propounding party in presenting the evidence.

1 5. The parties further stipulate that any material provided to the parties under
2 this order and not used at trial shall be returned to defendants' counsel within 30 days of the
3 conclusion of trial. All confidential material, whether admitted in evidence or not, shall
4 be returned to defendants' or destroyed within 30 days of the conclusion of this litigation by the
5 exhaustion of all possible appeals or, if no appeals are taken, the expiration of the time in
6 which a party may appeal.

7 SO STIPULATED.

8 Dated: 11/9/06

PRICE AND ASSOCIATES

9
10 By: 
11 PAMELA Y. PRICE
12 OK-HEE SHIM
13 Attorneys for Plaintiff
14 CLARK WALKER

15 Dated: 11/10/06

16 SILVANO B. MARCHESI, County Counsel

17 By: 
18 BERNARD L. KNAPP
19 Deputy County Counsel
20 Attorneys for Defendants
21 CONTRA COSTA COUNTY,
22 KEITH RICHTER and RICHARD
23 GRACE

24 SO ORDERED.

25 Dated: 11/15/06



26 STIPULATION AND [PROPOSED] ORDER RE: DISCLOSURE OF CONFIDENTIAL
27 MATERIALS AT TRIAL - C 03 3723 TEH 3